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Attorney For Employer Oleanders Holdings, LLC d/b/a Sacramento Sub-Acute

UNITED STATES OF AMERICA

BEFORE THE NATIONAL LABOR RELATIONS BOARD

REGION 20

OLEANDERS HOLDINGS, LLC)		
D/B/A SACRAMENTO SUB-ACUTE,)		
Employer,)	Case	20-RC-074337
and.)		
)		
SEIU UNITED HEALTHCARE WORKERS)		
WORKERS WEST CTW, CLC,)		
)		
Union -Petitioner.)		
	_)		

EMPLOYER'S ERRATUM TO SUPPLEMENTAL BRIEF AND REQUEST FOR ADMINISTRATIVE NOTICE

COMES NOW Oleanders Holdings, LLC, d/ba/ Sacramento Sub-Acute, the

Employer in the above-captioned representation case and submits this erratum to the

Supplemental Brief and Request for Administrative Notice it previously filed in this matter.¹

In its Supplemental Brief the Employer asked the Board to take administrative notice that

Petitioner SEIU-UHW had recently filed a representation petition seeking to represent the

Licensed Vocational Nurses ("LVN") employed by the Employer at its Sacramento, California

facility. Further, the Employer noted that the filed petition sought a union *limited* to LVNs.

While the filed petition is so limited and seemingly seeks a unit limited to LVNs, the

SEIU-UHW has since advised the Region and the Employer that, in fact, it seeks an Armour-

Globe election to have the LVNs vote on whether they wish to join the existing "service and

maintenance" unit. Accordingly, this erratum is filed to advise the Board of the SEIU-UHW's

position with respect to the LVN representation petition.

As of this date, the Employer has not taken a position with respect to whether the LVNs

share a "community of interest" with the service and maintenance unit such that an Armour-

Globe election is appropriate.

Dated: April 23, 2012

Respectfully Submitted,

s/HENRY F. TELFEIAN

Law Office of Henry F. Telfeian

By: Henry F. Telfeian

Attorney For Employer

SEIU-UHW, the Petitioner in this matter, contacted Employer's counsel and requested that this erratum be filed. The Employer agreed to the union's request. Accordingly, although the filing deadline for briefs in this matter has passed, the Employer requests that this erratum be

accepted for filing.

CERTIFICATE OF SERVICE

This is to certify that on this date I have served a true and correct copy of EMPLOYER'S ERRATUM TO SUPPLEMENTAL BRIEF AND REQUEST FOR ADMINISTRATIVE NOTICE in Case No. 20-RC-074337 via electronic mail, on the Regional Director of Region 20 as follows:

Joseph F. Frankl Regional Director, Region 20 National Labor Relations Board 901 Market Street, Suite 400 San Francisco, CA 94103-1738 NLRBRegion20@nlrb.gov

The EMPLOYER'S ERRATUM TO SUPPLEMENTAL BRIEF AND REQUEST FOR ADMINISTRATIVE NOTICE was also served, via electronic mail, upon counsel of record for the Petitioner, as follows:

Manuel A. Boigues, Esq. Weinberg, Roger & Rosenfeld 1001 Marina Village Parkway, Suite 200 Alameda, CA 94501-1091 mboigues@unioncounsel.net

This 23rd day of April 2012.

s/ Henry F. Telfeian

Law Office of Henry F. Telfeian 1247 Alvarado Road Berkeley, CA 94705